Turkey Creek CD

200 S. Santa Fe Av., 4th Floor
Pueblo, CO 81003

October 16, 2008

Kim B. Headley
Planning and Development
Director
229 West 12th Street
Pueblo, CO 81003-2810

Dear Mr. Headley:

Thank you for requesting our comments on the proposed Colorado Springs Utilities SDS project and their request for a Pueblo County 1041 Permit.

Turkey Creek Conservation District has had, and continues to have serious concerns about the effect that the SDS project will have on agriculture, people and natural resources within the Turkey Creek District. The Turkey Creek Conservation District contains a diversity of land uses and people, all of which will be impacted if the SDS project is allowed to be implemented.

The concerns of my constituents and of the Turkey Creek Board revolve mostly around the additional surface flows added to Fountain Creek. It is important to understand that storm surge and flash flood events have already been increased dramatically along the creek from the addition of large amounts of imperious surfaces upstream. This has already lead to severe consequences to include: massive flood events, destruction of agricultural diversions and irrigation equipment, deposition of sediment in some agricultural fields and loss of land to others. With the addition of the return flows from SDS these effects will get much worse. While it is easy to say that flood events are "Acts of God," it is not that simple in the case of the Fountain. Contrary to CSU denials, flood events are exacerbated by the increased daily flows in the Fountain caused by introduction of hundreds of cubic feet of effluent from up stream sewage disposal systems.

In addition to additional surface flows there is the concern of degraded water quality. Several factors already exist that are degrading the quality of Fountain Creek. Chief among these factors is the sediment load and associated turbidity. Though Fountain Creek can be characterized as a shifting sandy bottom stream system and some level of sediment load is expected, the current loads are much higher than historically and naturally would occur. An increase in the amount and velocity of surface water flows will add the potential for even higher sediment loads.

It is also a proven fact that the addition of more surface flows will cause greater erosion potential and greater possibility for channel shifting. This potential poses several problems for residents of the Fountain Creek area and downstream users. Selenium levels are already being reported at four times the EPA suggested limit in the creek. It has also been suggested by independent research and is highly likely that the source of this selenium is the Pierre shale complexes that exist along Fountain Creek. If erosion is increased there will be an increase in the amount of this shale being broken down and added to the stream system. This has the potential to greatly increase the already high selenium levels. Additionally this has the potential to cause loss of land through major erosion events for residents of Fountain Creek area. To agriculture, loss of land equals loss of income!

Taking water from the Municipal outlet at the Pueblo Reservoir has already been shown to have the potential to cause head loss to the Pueblo Municipal system. In addition to this it will cause a drop in flows for recreation, wildlife, and aesthetic values. The City of Pueblo has a growing economy and recreation is part of that growth. Boating and fishing will be diminished if flows are altered below the dam.

A quick survey of wildlife species that could be impacted on the potential route of the pipeline shows many that are in great peril and some that are protected at the state and federal level. Some of the species that will be negatively affected include burrowing owls, ferruginous hawks, golden eagles, leopard frogs, and Arkansas darter. ALL of these species are either of special concern in Colorado or nationally.

The plains environment that this proposed pipeline will cross is extremely fragile from both a wildlife and a hydrologic point of view. Numerous drainages and ephemeral waterways cross the potential grade of the pipeline. In addition to potential for washout of the pipeline, these waterways are important to many wildlife species and to the prevention of flooding.

Finally there is a threat to Pueblo County that has been barely considered in the implementation of this project and that is the threat to public health and human life. An increase to flows in Fountain Creek would likely be absorbed partially by the expansion of wetland areas and standing water. Any expansion of wetland areas and standing water has the potential to increase the level of vector competent (disease carrying) species to the area. Of greatest concern are *Culex* species mosquitoes that are capable of carrying West Nile virus.

It is the view of both my constituents and the board of the Turkey Creek Conservation District that the approval of the 1041 permit application and subsequent continuation of the SDS project presents unnecessary threat to the people, and resources of this county. We therefore recommend an outright denial of the 1041 application. However knowing that there is high potential for approval and that the growth in Colorado Springs may necessitate this we have the following suggested conditions. If the application is approved there should be a clause that allows for the reimbursement 100% or of at least 80% of any damages to landowners caused by negative effects of this project. Colorado Springs Utilities should be required to take into account sensitive wildlife species and hydrology during the construction process.

On behalf of the people I represent I ask you to take into account the people of Pueblo County and to put the health, safety, and economic wellbeing of this county first in your subsequent decision.

Respectfully,

Bill Alt

Bill Alt
President